

EXHIBIT 1

**Plaintiffs' More Definite Statement as to
Defendant Shahir Batterjee**

1. Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849; World Trade Center Properties LLC, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7280 (RCC); and Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC); 04 CV 7279 (RCC), including all of the allegations and claims contained therein.

Shahir Batterjee and Triple-B Trading

2. Shahir Batterjee is listed as an owner of Triple-B Trading GmbH, a self-described import-export concern that does no apparent business and is headquartered in the same town as Tatex and Abdul Matin Tatari's place of residence. The other two owners are Mazin Mohammad Bahareth, listed as BIF's treasurer and a top executive of the Bahareth Organization, a Saudi construction conglomerate; and Hassan Bahfzallah, who oversaw BIF's Saudi Arabia operations in the early 1990s and is listed as an official in three northern Virginia charities that were raided in March 2002 by federal agents probing alleged ties to Al Qaeda. Abdul Matin Tatari is listed as Triple-B's managing director. Shahir Batterjee is the scion of a wealthy Saudi family who was an officer and director of Benevolence when it established its Palos Hills office nearly a decade ago. According to the Illinois secretary of state Shahir and Adel Batterjee and Mazen Bahareth were listed as the foundation's incorporators and directors.
3. Corporate records show that the Batterjee family's holdings in the Middle East and Europe are vast and highly diversified, reporting annual sales well into the hundreds of millions of dollars from real estate, computers, supermarkets, hospitals, health-care products, pharmaceuticals, medical equipment, hotels and even an ice cream factory. By contrast, the family's German outpost, Triple-B Trading, consists of one employee (Abdul Matin Tatari) and about \$25,000 in capital, according to records on file in the neighboring state of Schleswig-Holstein, where Triple-B was incorporated in 1995 as an exporter of food, clothing and industrial equipment. Reached by telephone in Saudi Arabia, Shahir Batterjee refused to discuss the activities or purpose of Triple-B Trading. "I don't answer questions on the phone," he said repeatedly before hanging up.
4. Abdul Matin Tatari told the *Chicago Tribune* in November 2002 that he has known Shahir Batterjee for 15 to 16 years. Tatari said he met Shahir through Shahir's father, Abdulraouf Ibrahim Batterjee, who heads a large Saudi company that imports medical equipment, and his uncle, Mohammed Ibrahim Batterjee, whose enterprises include Jeddah's Jumbo Ice Cream Factory. He has known both elder Batterjees since 1983. Tatari acknowledged numerous business transactions between Tatex and the Batterjee family, including the sale to Mohammed Ibrahim Batterjee of a summer home near Rethwisch and 17 trucks to be used as "ice cream cars." Shahir Batterjee visits Tatari

three or four times a year on buying trips for German textiles that are exported to Saudi Arabia and used to make women's underwear for sale in the family's garment shops. Tatari also told the *Tribune* that he buys textiles through Tatex and then sells them to Batterjee for a 10 percent commission, instead of using the Triple-B partnership for mutual purchase/sale transactions.

More Information on Abdul Matin Tatari and Al Qaeda Connection

5. Abdul Matin Tatari is a 60 year old Syrian-born German citizen who is the owner and principal investor in Tatex Trading GmbH and Tatari Design—German textile firms with sales of several million dollars per year. He moved to Germany from Syria in 1962. German intelligence officials told the *Chicago Tribune* in November 2002 that the Syrian government has identified Tatari as a member of the Muslim Brotherhood. On Tuesday September 10, 2002, German authorities seized documents and financial information from Tatari's two homes and three company warehouses. German intelligence officials had been investigating Tatari, his wife, and two sons since July 2002 on suspicion that the family is using its companies as a front to launder money for terrorist organizations and smuggle Islamic militants into Western Europe. Investigators are also examining 111 commercial visa requests filed by Tatex from 2000-2002 for "prospective buyers." Investigators suspect some of the applicants were actually al Qaeda operatives or other militants from Syria, Egypt and Jordan. The Tatari's were briefly detained in September 2002 and are currently living freely in Germany while the government continues its investigation of Tatex and affiliated companies.

6. Tatari's son, Mohammed Hadi Tatari has admitted personally knowing several members of the Hamburg cell including Mounir el Motassadeq, Mohammed Atta, and Mohammed Haydar Zammar, the man who investigators believe recruited Atta, Al-Shehhi, Jarrah and others from Hamburg to visit training camps in Afghanistan in November 1999. In fact, Hadi acknowledged knowing Zammar since meeting him in 1971 at the age of 11. The senior Tatari told the *Chicago Tribune* that his son stood as a witness at Motassadeq's wedding and the pair traveled to Denmark in March 2000 for an undisclosed purpose, at a time when hijacking plans were being made in Hamburg. Hadi Tatatri has told authorities that he knew the cell members but had no prior knowledge of their plans or activities.

7. According to German authorities, several members of the Hamburg cell worked at Tatex GmbH during the 1990s. These individuals include: Mohammed Atta, Zammar (three different stints), and Mamoun Darkanzali, who worked at Tatex briefly around 13 years ago.

8. A search of internal German documents revealed that Hadi Tatari was a signatory on an application to establish a Muslim prayer room for the 'Islam AG' Muslim student group at the Technical University Hamburg of which several members were also active in the Hamburg cell. Related materials seized from el Motassadeq's apartment include a printed piece of paper with contact information for Tatex Trading, a personal pocket calendar with the phone numbers of Mohammed Hadi Tatri (Abdul's son) and Abdul's wife, Karen Tatari. It was discovered that el Motassadeq called the Tatari's home phone line

(#04822-6821) in October 2000. Also, the documents show that M.H. Zammar called Tatex Trading GmbH on October 7, 2001 at 1:18pm.

9. Shahir Batterjee is listed as Vice President on BIF's 1993 Form 990.
10. Shahir Abdulraoof Batterjee, Adel Abduljalil Batterjee's brother, is listed as a co-conspirator, aider and abettor of the Benevolence International Foundation (a/k/a al-Birr al-Dawalia).
11. Shahir Batterjee is listed on the board of the BIF Florida branch. He appears to be currently living at 1255 E University Dr Apt 181, Tempe, AZ 85281.